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5 Attorneys for Plaintiff Bruce Johnson and
Proposed Co-Lead Counsel

6 [Additional Counsel on Signature Page.]
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 GERALD EASTON, Derivatively On
11 Behalf of QUESTCOR
PHARMACEUTICALS, INC.,

12 Plaintiff,
13

14 vs.

15 DON M. BAILEY, MICHAEL H.
MULROY, STEPHEN L. CARTT,
DAVID YOUNG, VIRGIL D.
16 THOMPSON, MITCHELL J. BLUTT,
MD, NEAL C. BRADSHER,
17 STEPHEN C. FARRELL, LOUIS E.
SILVERMAN and SCOTT M.
18 WHITCUP, MD.,

19 Defendants,
20

– and –

21 QUESTCOR PHARMACEUTICALS,
INC., a California Corporation,

22 Nominal Party.
23

Case No. SACV12-01716-DMG
(FMOx)

NOTICE OF MOTION AND MOTION
FOR CONSOLIDATION AND
APPOINTMENT OF LEAD
COUNSEL

DATE: November 30, 2012
TIME: 9:30 a.m.
CTRM: 7
JUDGE: Hon. Dolly M. Gee

Date Case Filed: 10/4/12

24 Caption continued on following pages.
25
26
27
28

1 BRUCE JOHNSON, Derivatively on
2 Behalf of QUESTCOR
3 PHARMACEUTICALS, INC.,

4 Plaintiff,

5 vs.

6 DON M. BAILEY, MICHAEL H.
7 MULROY, STEPHEN L. CARTT,
8 DAVID YOUNG, VIRGIL D.
9 THOMPSON, MITCHELL J. BLUTT,
10 NEAL C. BRADSHAW, STEPHEN C.
11 FARRELL, LOUIS E. SILVERMAN
12 and SCOTT M. WHITCUP,

13 Defendants,

14 – and –

15 QUESTCOR PHARMACEUTICALS,
16 INC.,

17 Nominal Party.

) Case No. SACV12-01718-DMG
(FMOx)

) Date Case Filed: 10/4/12

18 NILABRATA GOSWAMI, Individually
19 and On Behalf of All Others Similarly
20 Situated,

21 Plaintiff,

22 vs.

23 DON M. BAILEY, MICHAEL H.
24 MULROY, STEPHEN L. CARTT,
25 DAVID YOUNG, VIRGIL D.
26 THOMPSON, MITCHELL J. BLUTT,
27 and STEPHEN C. FARRELL,

28 Defendants,

– and –

QUESTCOR PHARMACEUTICALS,
INC.,

Nominal Defendant.

) Case No. SACV12-01753-DMG
(FMOx)

) Date Case Filed: 10/11/12

Caption continued on following page.

1 EARL RICHARDS, Individually and
2 On Behalf of All Others Similarly
3 Situated,

4 Plaintiff,

5 vs.

6 DON M. BAILEY, MICHAEL H.
7 MULROY, STEPHEN L. CARTT,
8 DAVID YOUNG, VIRGIL D.
9 THOMPSON, MITCHELL J. BLUTT,
10 and STEPHEN C. FARRELL,

11 Defendants,

12 – and –

13 QUESTCOR PHARMACEUTICALS,
14 INC.,

15 Nominal Defendant.

Case No. SACV12-01754-DMG
(FMOx)

Date Case Filed: 10/11/12

16 JAMES TRIPOLI, Derivatively On
17 Behalf of QUESTCOR
18 PHARMACEUTICALS,

19 Plaintiff,

20 vs.

21 DON M. BAILEY, MICHAEL H.
22 MULROY, STEPHEN L. CARTT,
23 DAVID YOUNG, DAVID J.
24 MEDEIROS, MITCHELL J. BLUTT,
25 VIRGIL D. THOMPSON, STEPHEN
26 C. FARRELL, NEAL C. BRADSHAW,
27 LOUIS E. SILVERMAN, and SCOTT
28 M. WHITCUP,

Defendants,

– and –

QUESTCOR PHARMACEUTICALS,
INC., a California Corporation,

Nominal Defendant.

Case No. SACV12-01759-AG(MLGx)

Date Case Filed: 10/11/12

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on November 30, 2012, at 9:30 a.m., or as soon
3 thereafter as the matter may be heard, in the Courtroom of the Honorable Dolly M.
4 Gee, Courtroom 7, United States District Court for the Central District of California,
5 Western Division, 312 N. Spring Street, Los Angeles, California 90012, Plaintiffs
6 Gerald Easton ("Easton") and Bruce Johnson ("Johnson") (collectively the
7 "Plaintiffs") will and hereby do move this Court for an order: (1) consolidating the
8 above-captioned related shareholder derivative actions (the "Derivative Actions"); (2)
9 appointing The Weiser Law Firm, P.C. and Johnson & Weaver, LLP as Co-Lead
10 Counsel for all plaintiffs in the Derivative Actions (and any later-filed actions that are
11 subsequently consolidated therewith); and (3) granting such other relief as the Court
12 deems just and proper (collectively the "Motion").

13 This Motion is brought pursuant to Rule 7 of the Local Rules of this Court, and
14 Rules 23.1 and 42(a) of the Federal Rules of Civil Procedure. The Motion is based
15 upon this Notice of Motion, the accompanying Memorandum of Points and
16 Authorities in support thereof, the proposed order filed with the Motion, the
17 Declaration of Kathleen A. Herkenhoff in Support of Motion for Consolidation and
18 Appointment of Lead Counsel and the exhibits thereto (the "Herkenhoff Decl."), and
19 the Declaration of Frank J. Johnson in Support of Motion for Consolidation and
20 Appointment of Lead Counsel and the exhibits thereto (the "Johnson Decl.").

21 As detailed in the Herkenhoff Decl., pursuant to Local Rule 7, counsel for
22 Plaintiffs commenced the meet and confer process in connection with this Motion on
23 October 15, 2012, and have had numerous discussions with counsel for each of the
24 parties named in the Derivative Actions. Nominal Party Questcor Pharmaceuticals,
25 Inc. ("Questcor") and the Defendants do not oppose consolidation, but take no
26 position on the appointment of Lead Counsel. Plaintiff James Tripoli agrees that
27 consolidation is proper, but seeks to appoint his counsel, Robbins Umeda LLP
28 ("Robbins Umeda"), as Lead Counsel. Counsel for Plaintiffs Richards and Goswami

do not oppose consolidation, but have indicated that they intend to support Robbins Umeda as Lead Counsel.

DATED: October 26, 2012

THE WEISER LAW FIRM, P.C.
KATHLEEN A. HERKENHOFF (SBN
168562)

/s/ Kathleen A. Herkenhoff
KATHLEEN A. HERKENHOFF

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Attorneys for Plaintiff Gerald Easton and
Proposed Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2012, I authorized the electronic filing of the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I hereby certify that I am a member of the Bar of the United States District Court, Central District of California.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 27, 2012.

s/ KATHLEEN A. HERKENHOFF
KATHLEEN A. HERKENHOFF

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Mailing Information for a Case 8:12-cv-01716-DMG-FMO

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Frank J Johnson**
frankj@johnsonandweaver.com,shawnf@johnsonandweaver.com,shelbyr@johnsonandweaver.com
- **Peter Bradley Morrison**
peter.morrison@skadden.com,alejandra.lopez@skadden.com,allison.velkes@skadden.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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